

02/21/2022 12:27 FAX

0001/0003

**BENNETT BRICKLIN & SALTZBURG, LLC**  
**ATTORNEYS AT LAW**  
Centre Square, West Tower | 1500 Market Street, 32nd Floor  
Philadelphia, PA 19102  
Phone: (215) 561-4300 | Fax: (215) 561-6661

This facsimile transmission is intended only for the addressee shown below. It may contain information that is privileged, confidential or otherwise protected from disclosure. Any review, dissemination or use of this transmission or its contents by persons other than the addressee is strictly prohibited. If you have received this transmission in error, please notify us immediately by telephone and mail the original to us at the above address.

**FILE NUMBER:** 4065-123597**DATE:** February 21, 2022**FROM:** Nicholas A. Cummins**TELEPHONE:** (215) 665-3328**FACSIMILE NO:** (215) 561-6661**Attention:****Company:****Facsimile No:**

Honorable John Milton Younge USDC, Eastern District of Pennsylvania (267) 299-7368

Number of Pages (including cover sheet): 3

Message: Theophalis Wilson v. City of Philadelphia, et al.  
U.S.D.C., Eastern District of PA, No. 21-cv-2057

PLEASE CALL IMMEDIATELY IF THERE ARE ANY PROBLEMS WITH THIS FAX

**BENNETT, BRICKLIN & SALTZBURG LLC**  
ATTORNEYS AT LAW  
CENTRE SQUARE, WEST TOWER | 1500 MARKET STREET, 32ND FLOOR  
PHILADELPHIA, PA 19102  
PHONE: (215) 561-4300 | FAX: (215) 561-6661

WWW.BBS-LAW.COM

DIRECT DIAL: (215) 665-3328  
EMAIL: cummins@bbs-law.com

February 21, 2022

**VIA FACSIMILE**

Honorable John Younge  
James A. Byrne U.S. Courthouse  
601 Market Street, Room 4007  
Philadelphia, PA 19106

RE: Theophalis Wilson v. City of Philadelphia, et al.  
U.S.D.C., Eastern District of PA, No. 21-cv-02057  
Our File No. 4065-123597

Dear Judge Younge:

I have recently been retained to represent defendants, Frank Jastrzembski and Manuel Santiago in this matter. Enclosed for the Court's approval is a proposed stipulation extending the time for my clients to respond to the amended complaint to March 3, 2022. If it meets with the Court's approval, I would respectfully request that the Court execute the stipulation and have it filed of record.

Thank you for your consideration of this matter.

Respectfully yours,

  
Nicholas A. Cummins

NAC/amp  
Enclosure

cc: *Via Email (w/enc.)* –  
Kimberly K. Winter, Esquire  
Danielle Walsh, Esquire  
Joseph J. Santarone, Esquire

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

---

THEOPHALIS (BINKY) WILSON

v.

CITY OF PHILADELPHIA, PENNSYLVANIA, et al. : NO: 21-cv-02057-JMY

---

**STIPULATION FOR EXTENSION TO RESPOND TO COMPLAINT**

AND NOW, on this 18<sup>th</sup> day of February, 2022, it is hereby STIPULATED and AGREED by the undersigned counsel on behalf of their respective clients that the time for defendants, **Frank Jastrzembski and Manuel Santiago**, to answer or otherwise respond to the amended complaint is extended to **March 3, 2022**.

**LATHROP GPM LLP**

/s Kimberly K. Winter

KIMBERLY K. WINTER  
Attorney for Plaintiff,  
Theophalis Wilson

**CITY OF PHILADELPHIA LAW  
DEPARTMENT**

/s Danielle Walsh

DANIELLE WALSH  
Attorney for Defendants,  
City of Philadelphia, Frank Margerum,  
Richard Harris, and Kevin Hollinshead

**BENNETT, BRICKLIN & SALTZBURG LLC**

/s Nicholas A. Cummins

NICHOLAS A. CUMMINS  
Attorney for Defendants,  
Frank Jastrzembski and Manuel Santiago

**MARSHALL DENNEHY WARNER  
COLEMAN & GOGGIN**

/s Joseph J. Santarone

JOSEPH J. SANTARONE  
Attorney for Defendants,  
Lynne Abraham and David Desiderio

**Approved and So Ordered,**

**BY THE COURT:**

---

John M. Younge, U.S.D.J.

Date: \_\_\_\_\_